



Department of Emergency Management
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London N. Breed
Mayor

Mary Ellen Carroll
Executive Director

September 19, 2019

Michael J. Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission (FCC)
445-12th Street, SW
Washington, D.C. 20554

Dear Mr. Wilhelm:

Subject: AMENDED – San Francisco Department of Emergency Management application for FCC Rule Waiver – PS Docket Number 15-91, ID Number 201909052664705659

The San Francisco Department of Emergency Management (DEM) hereby amends its letter dated August 26, 2019, requesting an FCC Rule Waiver for an exemption from 47 CFR, Part 10 and 47 CFR, Part 11 rules (Waiver) to allow the execution of a special test of the Wireless Emergency Alert (WEA) System to test the system. The geographic area of the test will be within the City and County of San Francisco. This amended letter provides additional information and context regarding the strategic importance to conduct the test on October 17, 2019 due to the annual ShakeOut earthquake drill and 30th Anniversary of the 1989 Loma Prieta earthquake on this date; and explains the rationale for the proposed WEA test message verbiage.

The Cities of Oakland and San Diego recently conducted tests to determine the feasibility to use the Integrated Public Alert and Warning System (IPAWS) WEA alert system on a countywide basis. The City and County of San Francisco requests permission to conduct a WEA live code test on Thursday, October 17, 2019 between 5:15 p.m. and 5:45 p.m. Pacific Daylight Time (PDT). The purpose of the test is to: 1) test San Francisco's ability to execute a Wireless Emergency Alert and 2) promote earthquake safety and preparedness while leveraging the 30th anniversary of the 1989 Loma Prieta earthquake. If the date of the test needs to be changed due to unforeseen circumstances, we will conduct the test the following week on October 24, 2019 between 3:00 p.m. and 3:30 p.m. PDT.

There is up to a 99 percent probability that a magnitude 6.7 or higher earthquake will occur within the state anytime within the next 30 years. Effective alerts and warnings are a critical emergency management tool to help prevent hazards from becoming disasters by empowering residents to make informed decisions and take action to save lives and reduce property losses thus enabling quicker recovery. Without

this waiver, critical live testing cannot be conducted to evaluate the current capability of WEA within the City and County of San Francisco.

Rationale for the proposed test message verbiage: to promote earthquake preparedness and alert and warning education.

The proposed text of the test will read:

TEST SF Wireless Emergency Alert test. 30 yrs since '89 quake. Prepare @ www.SF72.org
TEST

The rationale for this test message verbiage is to leverage the City's collective commemoration of the 30th anniversary of the 1989 Loma Prieta Earthquake — the last and most significant disaster impacting San Francisco — which took place October 17, 1989 at 5:04 p.m. PDT

The test verbiage is strategically designed to prompt recipients to visit www.SF72.org, which is the City's emergency preparedness website. Visitors to the site will receive information about the WEA live code test, how to be prepared for earthquakes, how to register for emergency public information alerts through AlertSF, and to complete a survey about the respondent's experience receiving the WEA live code test. Please note: DEM will use the Federal Emergency Management Agency's (FEMA) Integrated Public Alert and Warning System to practice and test the proposed message while this waiver is being considered.

Rationale for the requested date and time: the 30th Anniversary of the Loma Prieta Earthquake and the Great California ShakeOut.

The Loma Prieta Earthquake anniversary on October 17 is a day during which the entire San Francisco Bay Area region's media markets dedicate a significant amount of coverage commemorating the 1989 Loma Prieta Earthquake anniversary with emphasis on how to be prepared for the next major earthquake. This year, the Great California ShakeOut (the statewide "drop, cover and hold-on" earthquake drill that occurs every third Thursday of October) coincides with the Loma Prieta Earthquake anniversary. The ShakeOut time coincides with the date: 10/17 at 10:17 a.m. PDT.

ShakeOut is the world's largest earthquake drill with nearly nine million people registered throughout the entire State of California to date. Since ShakeOut's inception in 2008, DEM has organized a special media event in partnership with the San Francisco Unified School District (SFUSD) and the Mayor of San Francisco during which the Mayor joins an elementary school class and participates in the ShakeOut drill with the students.

The ShakeOut media event with the Mayor and an SFUSD school is consistently covered by all significant Bay Area media markets. Leveraging this year's ShakeOut drill with the Mayor would be an ideal opportunity to amplify information about the WEA test hours in advance of the actual test.

The free media coverage ShakeOut and the Loma Prieta Earthquake anniversary will generate will be a vital tactic in the overall communications strategy to inform those who live in, work in, or visit San

Francisco to be aware of the test in advance, and know what to do following the test. This coverage is most likely impossible to replicate on any other date or time.

As part of this test, DEM will implement a comprehensive WEA Live Code Test outreach program to include the following elements:

1. DEM will conduct a conference call with members of the Cellular Telecommunications Industry Association to discuss the nature of the test, coordinate actions with wireless providers to administer the test, and gather input to improve the test design.
2. DEM will inform neighboring jurisdictions whose communities may receive the test message due to bordering proximity to the City and County of San Francisco.
3. DEM will ensure its 9-1-1 Dispatch Center is fully aware of the test and that first responders, including the California Highway Patrol, are equipped to inform stakeholders and general public that the activity is only a test.
4. DEM will conduct a stakeholder call with local, state, federal and private partners in San Francisco to announce the test, communicate information, answer questions, facilitate local participation and solicit feedback.
5. DEM will develop a general public-targeted communications strategy to inform all stakeholders about the test. The strategy will leverage social and traditional media in the weeks leading up to the test including outreach to local broadcasters and newspapers; hosting an in-person media event during the ShakeOut earthquake drill; and cross promotion through partner social media and public service digital platforms including but not limited to www.sfgov.org and www.sf311.org.

DEM will provide the FCC with a detailed account of any problems that occur in the distribution of the WEA test message, in addition to a post-test analysis. If you have any questions, or wish to discuss further, please contact my Chief of Staff, Adrienne Bechelli, at Adrienne.Bechelli@sfgov.org or 415-558-3810. Thank you for your consideration.

Sincerely,



Mary Ellen Carroll
Executive Director

cc: London N. Breed, Mayor
Sean Elsbernd, Mayor's Chief of Staff
Bijan Karimi, DEM Acting Deputy Director, Division of Emergency Services
Adrienne Bechelli, DEM Chief of Staff